

February 13, 2003

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>
> Honorable Michael Powell
> Chairman
> Federal Communications Commission 445 12th Street, SW
> Washington, DC 20544
>
> RE: CC Docket No. 01-338, Review of the Section 251 Unbundling Obligations
> of Incumbent Local Exchange Carriers
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>
> Dear Chairman Powell:
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> It's time for the FCC to dismantle the economically irrational facilities
> unbundling rules that have devastated the telecommunications industry and
> the high-tech manufacturing sector. Over the past 3 years over 500,000
> jobs have been lost, more than \$1.7 trillion in stock market
> capitalization has evaporated, and capital spending has been severely
> curtailed.
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> The FCC should create a national framework governing the telecom industry
> that incents facilities investment, and thus, creates an environment
> allowing for long-term, sustainable competition. On a national basis, the
> FCC should eliminate unbundled switching and the unbundled element
> platform (UNE-P). The FCC should eliminate other unbundling requirements
> where facilities-based competition has developed. For example,
> competition in the market for high capacity loops and transport is
> prolific in many areas of the country. Therefore, current unbundling
> requirements should be lifted.
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> The FCC should not extend unbundling requirements to broadband facilities.
> Freeing broadband investment from costly unbundling requirements will
> incent investment and deployment of valuable new technologies nationwide.
> The products and services provided by broadband technologies will add
> significant value, efficiencies and capabilities to small and large
> businesses across the U.S.
> A recent study released by the Progress and Freedom Foundation found that
> eliminating the current unbundling regime would result in the creation of
> 1.115 million new jobs in the communications sector and an increase in
> capital spending of \$169.5 billion over the next five years.
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> I urge the FCC to support eliminating the current and harmful unbundling
> regime in favor of a new paradigm encouraging sustainable competition and
> facilities investment.
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> Sincerely,
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>
> cc:
>
> Commissioner Abernathy
> Commission Adelstein
> Commissioner Martin

> Commissioner Copps